IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In re Dealer Management Systems Antitrust Litigation, MDL 2817

No. 1:18-CV-00864

This document relates to:

Hon. Robert M. Dow, Jr.

Motor Vehicle Software Corp. v. CDK Global, LLC, et al., Case No. 1:18-cv-00865 (N.D. Ill.)

Magistrate Judge Jeffrey T. Gilbert

DEFENDANT THE REYNOLDS AND REYNOLDS COMPANY'S MOTION FOR LEAVE TO FILE ITS PROPOSED AMENDED ANSWER AND AFFIRMATIVE DEFENSES

Defendant The Reynolds and Reynolds Company ("Reynolds"), pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, respectfully moves this Court for leave to file its proposed Amended Answer and Affirmative Defenses to Plaintiff Motor Vehicle Software Corp.'s Second Amended Complaint.

In support of this motion, Reynolds incorporates by reference the memorandum of law filed concurrently herewith, any reply memorandum that Reynolds may file, and any oral argument the Court may allow at a hearing on this motion.

[Signature block on following page]

Dated: March 18, 2020 Respectfully submitted,

/s/ Leo D. Caseria

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CERTIFICATE OF SERVICE

I, Leo D. Caseria, an attorney, hereby certify that on March 18, 2020, I caused a true and correct copy of the foregoing MOTION FOR LEAVE TO FILE ITS PROPOSED AMENDED ANSWER AND AFFIRMATIVE DEFENSES to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Leo D. Caseria

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